

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
TEXAS DALLAS DIVISION

LEA BLOTTIN

Plaintiff,

v.

MARY KAY, INC.,

Defendant.§
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Civil Action No. 3:10-CV-01905.M

DEFENDANT'S OBJECTIONS TO PLAINTIFF'S EXHIBIT LIST

Pursuant to this Court's Trial Setting Order (doc. 79), Plaintiff Lea Blottin designates the following exhibits which she intends to use as evidence at trial:

<i>Exh. No.</i>	<i>Description</i>	<i>Agree</i>	<i>Object</i>	<i>Admitted</i>
Pl. Ex. 1	"The Mary Kay Way" (book) by Mary Kay Ash, published by John Wiley & Sons, Inc., 2008		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 2	Mary Kay, Inc., EEO Policies			
Pl. Ex. 3	Mary Kay, Inc. "Our Core Values" Power Statements		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 4	Mary Kay, Inc., Leadership Practice Rules		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 5	Employee Handbook			
Pl. Ex. 6	Supervisor Manual			
Pl. Ex. 7	Nuts & Bolts: Essentials for Leadership Success! Manual			
Pl. Ex. 8	Quotes from Mary Kay Ash		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 9	Returning from Leave policy			

Pl. Ex. 10	Harassment Prevention Training Slides		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 11	Performance Improvement Process			
Pl. Ex. 12	Mary Kay, Inc., "Have you ever..." presentation		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 13	Organizational Chart – Sales & Marketing / Forecasting & Analysis – April 24, 2007			
Pl. Ex. 14	Blottin Performance Reviews		Relevance (FED. R. EVID. 401, 403) other than 2007-2009	
Pl. Ex. 15	Finance Division Work Schedule Guidelines			
Pl. Ex. 16	October 29, 2007, Expectations List			
Pl. Ex. 17	November 14, 2007, Blottin Performance Issues			
Pl. Ex. 18	March 17, 2008, Joiner memo to Blottin employee file			
Pl. Ex. 19	Joiner Formal Reminder – Performance Improvement Plan			
Pl. Ex. 20	Dasgupta Written Warning to Blottin			
Pl. Ex. 21	December 20, 2007, Gleaves memo re Blottin's demotion			
Pl. Ex. 22	January 5, 2008, Joiner email to Gleaves			
Pl. Ex. 23	Linda Martin memos re Blottin's leave			
Pl. Ex. 24	Emails re Blottin's paychecks while on leave			
Pl. Ex. 25	Tanja Edenfield Exit Interview – May 5, 2007		Relevance (FED. R. EVID. 401, 403)	

Pl. Ex. 26	Monica Marek Exit Interview – January 30, 2009		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 27	February 4, 2009, Dasgupta email to Blottin denying vacation request			
Pl. Ex. 28	June 21, 2009, Blottin resignation letter		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 29	April 25, 2000, Blottin hire letter		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 30	Blottin's resume		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 31	Blottin Mary Kay Rewards Statements		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 32	Blottin Acknowledgement of Receipt of Harassment Policy			
Pl. Ex. 33	Blottin Multi-Use Change Form – Transfer – December 6, 2004		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 34	Blottin Multi-Use Change Form – Promotion – March 16, 2006		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 35	Blottin Super Star Nomination – January, 1999		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 36	Blottin Super Star Award – 2007			
Pl. Ex. 37	Thank you from Charchoghlyan – October 23, 2007		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 38	Blottin Rising Above It All article in Company Newsletter		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 39	Blottin Certificate of Achievement – Nuts and Bolts			
Pl. Ex. 40	November 13, 2007, Jana Woods email to Blottin			

Pl. Ex. 41	December 6, 2007, Dobmeier email to Gleaves re: Blottin			
Pl. Ex. 42	Blottin's Concerns for Mary Kay, Inc. – December 10, 2007			
Pl. Ex. 43	2007 Blottin Performance Review Rebuttal		Hearsay (FED. R. EVID. 801) Authentication (FED. R. EVID. 901)	
Pl. Ex. 44	Joiner revisions of Blottin's work		Hearsay (FED. R. EVID. 801) Authentication (FED. R. EVID. 901)	
Pl. Ex. 45	Promotional SKU Forecasting Process Questionnaire		Hearsay (FED. R. EVID. 801)	
Pl. Ex. 46	Joiner handwritten notes, 2008			
Pl. Ex. 47	February 12, 2008, Blottin email to Joiner with markups		Hearsay (FED. R. EVID. 801) Authentication (FED. R. EVID. 901)	
Pl. Ex. 48	March 15, 2007, Blottin email to Gleaves re: team objectives			
Pl. Ex. 49	May 30, 2007, Gleaves email to Blottin re: Mercury Hall			
Pl. Ex. 50	June 13, 2007, Blottin email to Gleaves re: Gower			
Pl. Ex. 51	August 14, 2007, Blottin email to Gleaves re: Gower			
Pl. Ex. 52	November 12, 2007, Email exchange between Blottin and Henline			
Pl. Ex. 53	January 10, 2008, Notes re: meeting with Blottin, Gleaves, Dobmeier			

Pl. Ex. 54	January 14, 2008, Blottin Return to Work Release and memo			
Pl. Ex. 55	February 5, 2009, Notes re: Blottin and Dasgupta/Joiner			
Pl. Ex. 56	Internal Job Bid documents			
Pl. Ex. 57	Henline emails			
Pl. Ex. 58	Handwritten questions for HR			
Pl. Ex. 59	November 12, 2007, Gleaves meeting notice			
Pl. Ex. 60	EEOC Charge of Discrimination			
Pl. Ex. 61	December 23, 2008, Sanford letter to Simon re: Notice of EEOC Charge		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 62	EEOC Notice letter to Mary Kay, Inc.		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 63	EEOC Notice of Blottin Charge		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 64	Blottin Resignation letter – February 6, 2009			
Pl. Ex. 65	Blottin Multi-Use Change form – Supervisor change – December 1, 2008			
Pl. Ex. 66	Blottin Multi-Use Change form – Termination – February 6, 2009			
Pl. Ex. 67	Blottin Exit Interview – February 6, 2009		Hearsay (FED. R. EVID. 801)	
Pl. Ex. 68	February 13, 2009, Blottin email to Garza		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 69	February 13, 2009, Blottin facebook with Domke		Relevance (FED. R. EVID. 401, 403)	

Pl. Ex. 70	Gower Exit Interview – February 1, 2010		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 71	Blottin Drug test results and Blottin photo		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 72	Job Description – Promotional Forecasting Analyst – June, 2003		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 73	Job Description – Senior Business Analyst – October, 2003		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 74	April 18, 2006, Blottin promotion email		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 75	Acknowledgement for go-give act – August 24, 2004		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 76	September 18, 2006, Blottin promotion email			
Pl. Ex. 77	Henline Boss's Day card – October 18, 2007		Relevance (FED. R. EVID. 401, 403) Hearsay (FED. R. EVID. 801)	
Pl. Ex. 78	Blottin Boss's Day card		Relevance (FED. R. EVID. 401, 403) Hearsay (FED. R. EVID. 801)	
Pl. Ex. 79	Henline Congratulations card – August 30, 2006		Hearsay (FED. R. EVID. 801)	
Pl. Ex. 80	Henline Thank you card		Relevance (FED. R. EVID. 401, 403) Hearsay (FED. R. EVID. 801)	
Pl. Ex. 81	Henline handwritten note		Relevance (FED. R. EVID. 401, 403)	
Pl. Ex. 82	U.S. Forecasting Cycle – Desktop Procedure			
Pl. Ex. 83	Dr. Sims-Stover records			
Pl. Ex. 84	Dr. Tajani records			
Pl. Ex. 85	Blottin Outlook calendar			

Pl. Ex. 86	Joiner's Personal Daily Notes			
Pl. Ex. 87	Joiner's Calendar			
Pl. Ex. 88	Blottin note re: major – October 31, 2009			
Pl. Ex. 89	Herb Burkman Expert Report		FED. R. EVID. 701-703	
Pl. Ex. 90	Updated Expert Report of Herb Burkman		FED. R. EVID. 701-703	
Pl. Ex. 91	Statement of Defendant's net worth		Relevance (FED. R. EVID. 401, 403) Lack of Foundation (FED. R. EVID. 601)	

Plaintiff reserves the right to use in her case-in-chief any of the exhibits designated by Defendant.

Respectfully submitted,

GRUBER HURST JOHANSEN HAIL & SHANK LLP

/s/ A. Shonn Brown

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ATTORNEYS FOR DEFENDANT
MARY KAY INC.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing has been served upon all counsel of record via the Court's ECF filing on this 10th day of September, 2012, as follows:

Brian P. Sanford
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/s/ A. Shonn Brown

A. Shonn Brown